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8 Attorney for Plaintiff

FILED

2010-APR-6 PM 2:46

CLERK US DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

BY *CD* DEPUTY

8 **UNITED STATES DISTRICT COURT**  
9 **SOUTHERN DISTRICT OF CALIFORNIA**

10 **GUADALUPE ROCIO VEGA,**  
11 Plaintiff,

12 V.  
13 **DRS TECHNOLOGIES, INC.,**  
14 **JAY GRIM, individually,**  
15 **and DOES 1 through 50,**  
16 **Defendants.**

Case No.

**'10 CV 0720 LAB**

**POR**

**COMPLAINT FOR DAMAGES**

**DEMAND FOR JURY TRIAL**

1. Wrongful Termination in Violation of Public Policy
2. Discrimination Based on Gender and National Origin
3. Retaliation
4. Sexual Harassment
5. National Origin Harassment
6. Assault and Battery

17 Plaintiff asserts the following acts and violation of The Civil Rights Act of 1964.  
18

19 **THE PARTIES**

20 1. Plaintiff, Guadalupe Rocio Vega, hereinafter referred to as "plaintiff", or "Vega", is,  
21 and at all times relevant except for time spent in Iraq, was, a resident of, and employed within, San  
22 Diego County and within the jurisdiction of the court. Plaintiff was employed by the defendant  
23 business entity named and sued herein. Plaintiff is a Hispanic female.  
24

25 2. Defendant, DRS Technologies, Inc., hereinafter referred to as "DRS" or "defendant",  
26 is, and at all times relevant was, a business organization of unknown organizational form and  
27 soliciting employees from San Diego County for employment and was the employer of the plaintiff.  
28

3. Defendant, Jay Grim, hereinafter referred to as "Grim" or "defendant", is, and at all  
times relevant was, a managerial level employee of DRS and actively aided and abetted defendant

1 DRS's violations of Title VII. Grim was the Department Manager and managed about 16  
2 employees, including the plaintiff.

3       4. Plaintiffs are unaware of the true names and capacities of Defendants sued herein as  
4 DOES 1 through 50, inclusive, and therefore sues these Defendants by such fictitious names.  
5 Plaintiffs will seek leave of this Court to amend this Complaint to allege the true names and capacities  
6 when ascertained. Plaintiffs are informed and believe and thereon alleges that each said fictitiously  
7 named Defendant is responsible in some manner for the occurrences herein alleged, and is liable to  
8 Plaintiffs for the injuries and damages as herein alleged.

9       5. Plaintiffs are informed and believes and thereon alleges that the aforementioned DOES  
10 are somehow responsible for the acts alleged herein as the agents, employers, representatives,  
11 subsidiaries, parent organizations or employees of other named Defendants, and in doing the acts  
12 alleged herein were acting within the scope of their agency, employment or representative capacity  
13 of said named Defendants, or of each other.

14       6. In the course of the acts and events described in this Complaint, the Defendants,  
15 including DOE Defendants, agreed upon or ratified the acts which damaged Plaintiffs.

16       7. At the times mentioned in this Complaint, each of the Defendants was an agent or  
17 employee of his/her Co-Defendants and in doing the things alleged in this Complaint, was acting  
18 within the course, scope and authority of said relationship with the permission and consent of his/her  
19 Co-Defendants, except where specifically alleged otherwise.

20       8. The tortious acts and omissions alleged herein were performed by management level  
21 employees of DRS, and said acts were committed, authorized, encouraged or ratified by upper level  
22 managerial employees of the business, so as to render said business organization liable for punitive  
23 damages herein. The employer further demonstrated their willingness to encourage, authorize and  
24 ratify the illegal conduct of their employees and managers by wilfully failing and refusing to conform  
25 their business practices to the legal requirements for maintaining a workplace free from  
26 discrimination, harassment or retaliation.

27       ///

28       ///

## **JURISDICTION AND VENUE**

2 9. Plaintiff was, and still is, subject to and within the jurisdiction of the Court. All of  
3 plaintiff's damages were incurred in San Diego County, California with the exception of initial  
4 damages incurred in Baghdad, Iraq. Plaintiff entered into a firm agreement and contract for  
5 employment in Baghdad, Iraq with DRS. Plaintiff was never employed nor ever performed any  
6 work for DRS in any place other than Iraq or San Diego, California.

7 9. This Court has both subject matter jurisdiction and personal jurisdiction over these  
8 claims and parties pursuant to 42 USC §2000-e 5 (f) (3).

9       10.   Venue is proper because the illegal practices occurred in the judicial district of San  
10 Diego, California. Vega suffered a retaliatory wrongful termination while she was a DRS employee  
11 in San Diego, California. Vega was discriminated against on the basis of her gender, national origin  
12 and because of her sexual harassment complaint all in San Diego, California. Nearly all damages  
13 were incurred in San Diego, California. Vega was unlawfully terminated in San Diego, California.  
14 Vega's compensatory damages were incurred in San Diego, California, and the majority of illegal  
15 acts complained of occurred within this venue.

## DAMAGES

11. The amount of plaintiff's damages and amounts in controversy greatly exceed \$75,000.

## FACTS

19 12. Plaintiff was employed by DRS as a Senior Systems Engineer to perform work in  
20 Baghdad, Iraq. Plaintiff was interviewed in Iraq and entered into an agreement with DRS while  
21 she was in Iraq.

13. Plaintiff reported to her Manager, defendant Grim. Grim repeatedly, for about one month, subjected Vega to a hostile work environment by swearing loudly, calling her a “cunt” and a “fucking bitch.” Grim repeatedly used the derogatory terms “fucking cunts” and “bitches” toward other female employees, saying these derogatory terms in Vega’s presence.

14. Plaintiff's national origin is Mexican. Grim repeatedly made derogatory comments  
about Mexicans and that he had no problem shooting them. Grim made comments about "fucking  
illegals" and used other Spanish vulgar words and criticized the Spanish language. Grim stated her

1 would use the Spanish word “puta” in reference to Vega. Grim further made comments about  
2 “fucking Mexican immigrants” and the rape of a girl by a Mexican. Grim mocked the Spanish  
3 language in Vega’s presence.

4 15. Plaintiff made several complaints about Grim’s offensive behavior to other DRS  
5 supervisors, managers and Human Resources. At all times Grim’s behavior was offensive and  
6 unwelcome to the plaintiff.

7 16. In retaliation for her complaints, Grim called Vega a “Cunt” and told her “I’m tired of  
8 your shit. Grim retaliated further by talking more about shooting Mexicans and unfairly criticized  
9 Vega’s work. Grim suddenly grabbed Vega as she left a bathroom. Grim tried to grab Vega’s  
10 body but Vega defended herself and he was only able to grab her arm. Vega broke free and ran.

11 17. Plaintiff complained about the assault and Grim’s retaliatory behavior to DRS’s Human  
12 Resources.

13 18. Plaintiff suffered severe emotional distress and was quickly flown to San Diego,  
14 California.

15 19. While plaintiff was still a DRS employee, and on emergency medical leave, DRS made  
16 unreasonable demands to meet with her. DRS failed to conduct a reasonable investigation into her  
17 claims of a hostile work environment, assault and retaliation. Plaintiff’s health had deteriorated and  
18 she was unable to meet with DRS on the strict deadlines DRS unfairly imposed.

19 20. On June 16, 2008, DRS terminated Vega’s employment while she was being treated  
20 in San Diego, California.

21 21. Plaintiff was terminated in retaliation for making complaints about sexual and racial  
22 harassment, and for making complaints about the retaliation.

23 22. Although defendant may have had in effect a written policy prohibiting harassment,  
24 retaliation and discrimination, in truth the illegal conduct of defendant and others employed by  
25 defendants have been part of a set of pervasive, implied and express oral policy encouraging  
26 harassment, retaliation and discrimination. The essential illegal corporate policies of defendant are  
27 complained of herein.

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1       23. Throughout Plaintiff's employment, defendants allowed, permitted and encouraged  
2 harassment, retaliation and discrimination of Plaintiff. Plaintiff's repeated protests were routinely  
3 ignored.

4       24. Defendants had a corporate policy that encouraged, promoted, permitted and allowed  
5 harassment, retaliation, discrimination and sexual inequality by:

- 6       a. failing and refusing to fully, promptly, thoroughly and effectively investigate claims of  
7            harassment, retaliation and discrimination;
- 8       b. failing and refusing to take immediate appropriate corrective action against perpetrators  
9            of unlawful harassment, retaliation and discrimination;
- 10      c. management personnel setting a constant example and management style of harassment  
11            and demeaning conduct toward plaintiff;
- 12      d. retaliating against plaintiff for the complaint of harassment, retaliation and  
13            discrimination;
- 14      e. failing to comply with their legal requirements under California law to prevent  
15            harassment, retaliation and discrimination;
- 16      f. failing to adequately educate, train or supervise management level and supervising level  
17            employees regarding harassment, retaliation and discrimination;
- 18      g. failing to adequately monitor the workplace to determine whether illegal conduct such  
19            as harassment, retaliation and discrimination was occurring; and

20      25. Plaintiff frequently voiced protests over the harassment. However, as a result of  
21 plaintiff asserting the legal right to harassment, retaliation and discrimination free employment,  
22 plaintiff was terminated on a shallow pretext on June 16, 2008.

23      26. The unlawful acts and omissions of defendants alleged herein created an oppressive,  
24 offensive, abusive and hostile work environment of an extreme degree.

25      27. Plaintiff has filed a charge of discrimination and harassment with the California  
26 Department of Fair Employment and Housing ("DFEH") and with the United States Equal  
27 Employment Opportunity Commission and has received a "right-to-sue" letter entitling the plaintiff  
28 to bring a private civil action against defendants pursuant to Title VII of the Civil Rights Act of 1964,

1 | 42 USC §2000e et seq.

2 28. As a result of defendants' misconduct as alleged above, plaintiff has suffered emotional  
3 and mental distress and lost wages and benefits all to the plaintiff's detriment in an amount to be  
4 proven at trial. Plaintiff will seek punitive damages, and attorneys fees and costs pursuant to Title  
5 VII of the Civil Rights Act of 1964, 42 USC §2000e et seq.

## **FIRST CAUSE OF ACTION**

## **Wrongful Termination in Violation of Public Policy**

### **(Against all business entity defendants)**

9       29. Plaintiff hereby incorporates by reference each and every allegation contained in  
10 paragraphs 1 through 28 above.

11       30. Within the State of California and the United States of America there exists a  
12 substantial and fundamental public policy, set forth in the California Government Code §12900 et  
13 seq., and Title VII of the Civil Rights Act of 1964, 42 USC §2000e et seq. which forbids  
14 discrimination on the basis of gender and national origin, et al. Unlawful employment discrimination  
15 includes harassment and the right to be free from unwanted, offensive harassment, and the right to  
16 protest such conduct without fear of retaliation or further harm. This public policy of the state is one  
17 that benefits the public at large and guarantees the rights of an employee to perform their work free  
18 from harassment and discrimination.

19       31. As a proximate cause of defendants' harassment, retaliation and discrimination, and  
20 plaintiff's protests and resistance thereof, plaintiff was discharged from the plaintiff's position of  
21 employment in violation of the public policy of the State of California.

22 32. As a result of defendants' actions, plaintiff has suffered substantial losses in earnings  
23 and employment benefits and emotional distress in an amount to be determined according to proof  
24 at trial.

25       33. In doing the acts herein alleged, defendants acted with malice and oppression, and with  
26 a conscious disregard of plaintiff's rights, and plaintiff is entitled to exemplary and punitive damages  
27 from the defendants in an amount sufficient to punish defendants and to deter such wrongful conduct  
28 in the future.

## **SECOND CAUSE OF ACTION**

2 **Violation of Title VII of the Civil Rights Act of 1964, 42 USC §2000e et seq.- Discrimination**  
3 **(Against All Business Entity Defendants)**

4 34. Plaintiff hereby incorporates by reference each and every allegation contained in  
5 paragraphs 1 through 33 above.

6 35. Plaintiff, at all relevant times, had the right to work in an environment free of  
7 employment discrimination based upon the plaintiff's gender and national origin.

8       36. Title VII of the Civil Rights Act of 1964, 42 USC §2000e et seq. which forbids  
9 discrimination on the basis of gender and national origin, and imposes several affirmative duties  
10 in that regard upon the employer. Examples of Defendants violations of this statute, which examples  
11 are stated for representative purposes and are not intended to be exhaustive, are listed herein.

12       37.    Defendant DRS failed to have a legitimate policy or complaint procedure regarding  
13 harassment, retaliation and discrimination. Any policy defendant may; have had was merely paper  
14 "window dressing" to present an illusion of legal compliance. In reality, it had no effect.

15       38. The foregoing conduct by the defendants constitutes discrimination in employment.  
16 The retaliatory unlawful termination of plaintiff's employment was based primarily upon  
17 discriminatory reasons, (gender and national origin), expressly prohibited by the anti-discrimination  
18 statutes set forth in Title VII of the Civil Rights Act of 1964, 42 USC §2000e et seq.

19       38. As a result of defendants' actions, plaintiff has suffered, substantial losses in earnings  
20 and employment benefits and emotional distress in an amount to be determined according to proof  
21 at trial. Plaintiff is further entitled to injunctive relief and attorney's fees and costs of suit pursuant  
22 to Title VII of the Civil Rights Act of 1964, 42 USC §2000e et seq.

23       39. In doing the acts herein alleged, defendant DRS acted with malice and oppression, and  
24 with a conscious disregard of plaintiff's rights, and plaintiff is entitled to exemplary and punitive  
25 damages from the defendants in an amount sufficient to punish defendants and to deter such  
26 wrongful conduct in the future.

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### THIRD CAUSE OF ACTION

**Retaliation in Violation of Title VII of the Civil Rights Act of 1964, 42 USC §2000e et seq.**  
**(Against All Defendants)**

4 40. Plaintiff hereby incorporates by reference each and every allegation contained in  
5 paragraphs 1 through 39 above.

6       41      Title VII of the Civil Rights Act of 1964, 42 USC §2000e et seq. forbids retaliation  
7 against any employee opposing any practices forbidden under this section. When plaintiff  
8 complained about harassment and discrimination and made known the intention to take action,  
9 plaintiff suffered retaliation by the employer and the individual defendants and was terminated from  
10 employment as alleged herein.

11       42. The foregoing representative conduct by the defendants constitutes unlawful retaliation  
12 in violation of Title VII of the Civil Rights Act of 1964, 42 USC §2000e et seq.

13       43.     As a result of defendants' actions, plaintiff has suffered substantial losses in earnings  
14 and employment benefits and emotional and mental anguish in an amount to be determined according  
15 to proof at trial. Plaintiff is further entitled to injunctive relief and attorney's fees and costs of suit  
16 pursuant to Title VII of the Civil Rights Act of 1964, 42 USC §2000e et seq.

17       44.     In doing the acts herein alleged, defendants acted with malice and oppression and with  
18 a conscious disregard for plaintiff's rights, and plaintiff is entitled to exemplary and punitive damages  
19 from the defendants in an amount sufficient to punish defendants and to deter such wrongful conduct  
20 in the future.

## **FOURTH CAUSE OF ACTION**

## **Sexual Harassment in Violation of**

## **Title VII of the Civil Rights Act of 1964, 42 USC §2000e et seq.**

(Against All Defendants)

25       45. Plaintiff hereby incorporates by reference each and every allegation contained in  
26 paragraphs 1 through 44, inclusive.

27 46. Plaintiff, at all relevant times, had the right to work in an environment free of  
28 employment sexual or gender-based harassment.

1       47. Title VII of the Civil Rights Act of 1964, 42 USC §2000e et seq. forbids sexual  
2 harassment, and imposes several affirmative duties upon the employer to ensure employees are not  
3 subjected to such unlawful harassment at work. Examples of Defendants' violations of this statute,  
4 which examples are stated for representative purposes and are not intended to be exhaustive, are  
5 listed herein. The defendants directed their offensive, unwelcome misconduct toward plaintiff  
6 because of the plaintiff's gender.

7 48. Defendant DRS failed to have a legitimate policy or complaint procedure regarding  
8 harassment.

9       49.     The foregoing conduct by the defendants constitutes unlawful sexual harassment, and  
10 which created a hostile, abusive and discriminatory work environment and disrupted plaintiff's  
11 emotional tranquility in the work place.

12        50. Defendants' conduct, as set forth and alleged herein, constitutes a violation of Title VII  
13 of the Civil Rights Act of 1964, 42 USC §2000e et seq. which prohibits sexual harassment by an  
14 employer, manager, supervisor, co-worker et al.

15 51 As a result of defendants' actions, plaintiff has suffered, substantial losses in earnings  
16 and employment benefits and emotional distress in an amount to be determined according to proof  
17 at trial. Plaintiff is further entitled to injunctive relief and attorney's fees and costs of suit pursuant  
18 to Title VII of the Civil Rights Act of 1964, 42 USC §2000e et seq.

19       52.    In doing the acts herein alleged, defendants acted with malice and oppression, and with  
20 a conscious disregard of plaintiff's rights, and plaintiff is entitled to exemplary and punitive damages  
21 from the defendants in an amount sufficient to punish defendants and to deter such wrongful conduct  
22 in the future.

## **FIFTH CAUSE OF ACTION**

## **National Origin Harassment in Violation of**

**Title VII of the Civil Rights Act of 1964, 42 USC §2000e et seq.**  
**(Against All Defendants)**

27       53. Plaintiff hereby incorporates by reference each and every allegation contained in  
28 paragraphs 1 through 54, inclusive.

1       55. Plaintiff, at all relevant times, had the right to work in an environment free of  
2 employment harassment directed at the plaintiff due to the plaintiff's national origin.

3       56. Title VII of the Civil Rights Act of 1964, 42 USC §2000e et seq. forbids national origin  
4 harassment, and imposes several affirmative duties upon the employer to ensure employees are not  
5 subjected to such unlawful harassment at work. Examples of Defendants' violations of this statute,  
6 which examples are stated for representative purposes and are not intended to be exhaustive, are  
7 listed herein. The defendants directed their offensive, unwelcome misconduct toward plaintiff  
8 because of the plaintiff's national origin.

9       57. Defendant DRS failed to have a legitimate policy or complaint procedure regarding  
10 harassment.

11       58. The foregoing conduct by the defendants constitutes unlawful religious harassment,  
12 and which created a hostile and discriminatory work environment and disrupted plaintiff's emotional  
13 tranquility in the work place.

14       59. Defendants' conduct, as set forth and alleged herein, constitutes a violation of Title  
15 VII of the Civil Rights Act of 1964, 42 USC §2000e et seq. which prohibits national origin  
16 harassment by an employer, manager, supervisor, co-worker, et al.

17       60. As a result of defendants' actions, plaintiff has suffered, substantial losses in earnings  
18 and employment benefits and emotional distress in an amount to be determined according to proof  
19 at trial. Plaintiff is further entitled to injunctive relief and attorney's fees and costs of suit pursuant  
20 to Title VII of the Civil Rights Act of 1964, 42 USC §2000e et seq.

21       61. In doing the acts herein alleged, defendants acted with malice and oppression, and with  
22 a conscious disregard of plaintiff's rights, and plaintiff is entitled to exemplary and punitive damages  
23 from the defendants in an amount sufficient to punish defendants and to deter such wrongful conduct  
24 in the future.

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**SIXTH CAUSE OF ACTION**  
**(Assault and Battery)**  
**(Against Defendant Grim)**

4 62. Plaintiff hereby incorporates by reference each and every allegation contained in  
5 paragraphs 1 through 61 above.

6       63.    Defendant has engaged in non-consensual, offensive physical touching of plaintiff in  
7 violation of the statutes and common laws of the State of California. As a direct and proximate result  
8 of such assault and battery, plaintiff suffered the injuries and damages alleged above.

9       64.     The above said act of defendant Grim constitutes assault and battery upon plaintiff; such  
10 assault and battery are a substantial but not the sole cause of damage to the plaintiff, as set forth  
11 below. Plaintiff has suffered general damages and emotional distress in an amount to be shown  
12 according to proof.

13       65. In doing the acts herein alleged, defendant acted with malice and oppression, and with  
14 a conscious disregard of plaintiff's rights, and plaintiff is entitled to exemplary and punitive damages  
15 from defendant in an amount sufficient to punish defendant and to deter such wrongful conduct in the  
16 future.

**WHEREFORE**, Plaintiff prays for judgment against the Defendants as follows:

18 (1) For compensatory and incidental damages, including but not limited to lost wages,  
19 employee benefits, emotional distress, and other special and general damages according to proof;

20 (2) For an award of exemplary and punitive damages sufficient to punish the Defendants and  
21 deter such future conduct in an amount commensurate with each Defendant's ability to pay, which  
22 will be shown at trial;

(3) For an award of interest, including prejudgment interest, at the legal rate;

24 (4) For all remedies authorized by law under Title VII of the Civil Rights Act of 1964, 42  
25 USC §2000e et seq.:

26 (5) For an award of attorneys fees and costs incurred herein pursuant to Title VII of the Civil  
27 Rights Act of 1964, 42 USC §2000e et seq.:

28 (6) For such further relief, in law or in equity, as this court deems just and proper; and

1 (7) For injunctive relief, as requested above, and further prohibiting further Title VII  
2 violations of the type alleged herein.

3 Date: April 6, 2010

LAW OFFICE OF DAVID A. MILLER

4 By 

5 David A. Miller, Esq.

6 Law Office of David A. Miller

7 Attorney for Plaintiff Guadalupe Rocio Vega

11 **DEMAND FOR JURY TRIAL**

12 Plaintiff hereby demands trial by jury in this case.

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## CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

## I. (a) PLAINTIFFS

GUADALUPE ROCIO VEGA

(b) County of Residence of First Listed Plaintiff San Diego

(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorney's (Firm Name, Address, and Telephone Number)

David A. Miller, Esq. (SBN 140805) Law Offices of David A. Miller  
555 W. Beech Street, Ste 413, San Diego, CA 92101 (619)238-8015

## DEFENDANTS

DRS TECHNOLOGIES, INC., JAY GRIM, Individually and  
DOES 1 through 50, inclusive

2010 APR -6 PM 2:45

Newark

County of Residence of First Listed Defendant

(IN U.S. PLAINTIFF CASES ONLY) US DISTRICT COURT  
NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE  
LAND INVOLVED.

Attorneys (If Known)

'10 CV 0720 LAB

BY

DEPUTY

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## II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

<input type="checkbox"/> 1 U.S. Government Plaintiff	<input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party)
<input type="checkbox"/> 2 U.S. Government Defendant	<input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)

## III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

Citizen of This State	PTF	DEF	PTF	DEF
<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4
<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5
<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6

## IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance	<b>PERSONAL INJURY</b>	<b>PERSONAL INJURY</b>	<b>PROPERTY RIGHTS</b>	<input type="checkbox"/> 400 State Reapportionment
<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 362 Personal Injury - Med. Malpractice	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 410 Antitrust
<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 365 Personal Injury - Product Liability	<input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 430 Banks and Banking
<input type="checkbox"/> 140 Negotiable Instrument	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 368 Asbestos Personal Injury Product Liability		<input type="checkbox"/> 450 Commerce
<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 330 Federal Employers' Liability	<input type="checkbox"/> 370 Other Fraud		<input type="checkbox"/> 460 Deportation
<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 340 Marine	<input type="checkbox"/> 371 Truth in Lending		<input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations
<input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans)	<input type="checkbox"/> 345 Marine Product Liability	<input type="checkbox"/> 380 Other Personal Property Damage	<input type="checkbox"/> 820 Copyrights	<input type="checkbox"/> 480 Consumer Credit
<input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits	<input type="checkbox"/> 350 Motor Vehicle	<input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 830 Patent	<input type="checkbox"/> 490 Cable/Sat TV
<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 355 Motor Vehicle Product Liability	<input type="checkbox"/> 390 Other Personal Injury	<input type="checkbox"/> 840 Trademark	<input type="checkbox"/> 810 Selective Service
<input type="checkbox"/> 190 Other Contract				<input type="checkbox"/> 850 Securities/Commodities/ Exchange
<input type="checkbox"/> 195 Contract Product Liability				<input type="checkbox"/> 875 Customer Challenge 12 USC 3410
<input type="checkbox"/> 196 Franchise				<input type="checkbox"/> 890 Other Statutory Actions
<b>REAL PROPERTY</b>	<b>CIVIL RIGHTS</b>	<b>PRISONER PETITIONS</b>	<b>SOCIAL SECURITY</b>	<input type="checkbox"/> 891 Agricultural Acts
<input type="checkbox"/> 210 Land Condemnation	<input type="checkbox"/> 441 Voting	<input type="checkbox"/> 510 Motions to Vacate Sentence	<input type="checkbox"/> 861 HIA (1395ff)	<input type="checkbox"/> 892 Economic Stabilization Act
<input type="checkbox"/> 220 Foreclosure	<input checked="" type="checkbox"/> 442 Employment	<b>Habeas Corpus:</b>	<input type="checkbox"/> 862 Black Lung (923)	<input type="checkbox"/> 893 Environmental Matters
<input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 443 Housing/ Accommodations	<input type="checkbox"/> 530 General	<input type="checkbox"/> 863 DIWC/DIWW (405(g))	<input type="checkbox"/> 894 Energy Allocation Act
<input type="checkbox"/> 240 Torts to Land	<input type="checkbox"/> 444 Welfare	<input type="checkbox"/> 535 Death Penalty	<input type="checkbox"/> 864 SSID Title XVI	<input type="checkbox"/> 895 Freedom of Information Act
<input type="checkbox"/> 245 Tort Product Liability	<input type="checkbox"/> 445 Amer. w/Disabilities - Employment	<input type="checkbox"/> 540 Mandamus & Other	<input type="checkbox"/> 865 RSI (405(g))	<input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice
<input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 446 Amer. w/Disabilities - Other	<input type="checkbox"/> 550 Civil Rights		<input type="checkbox"/> 950 Constitutionality of State Statutes
	<input type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> 555 Prison Condition		
			<b>IMMIGRATION</b>	
			<input type="checkbox"/> 462 Naturalization Application	
			<input type="checkbox"/> 463 Habeas Corpus - Alien Detainee	
			<input type="checkbox"/> 465 Other Immigration Actions	
			<b>FEDERAL TAX SUITS</b>	
			<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)	
			<input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	

## V. ORIGIN

(Place an "X" in One Box Only)

 1 Original Proceeding 2 Removed from State Court 3 Remanded from Appellate Court 4 Reinstated or Reopened 5 Transferred from another district (specify) 6 Multidistrict Litigation

Appeal to District Judge from Magistrate Judgment

## VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):  
42 USC Section 200e et seq.Brief description of cause:  
Plaintiff alleges Hostile Work Environment, Retaliation, Discrimination, Battery, Harassment

## VII. REQUESTED IN COMPLAINT:

 CHECK IF THIS IS A CLASS ACTION  
UNDER F.R.C.P. 23

DEMAND \$ 2,500,000.00

CHECK YES only if demanded in complaint:  
JURY DEMAND:  Yes  No

## VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

04/06/2010

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

\$350

APPLYING IFFP

JUDGE

MAG. JUDGE

CR PS 04-06-10

Court Name: USDC California Southern  
Division: 3  
Receipt Number: CAS011946  
Cashier ID: mbain  
Transaction Date: 04/06/2010  
Payer Name: LAW OFFICE DAVID MILLER

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CIVIL FILING FEE  
For: VEGA V DRS TECHNOLOGIES  
Case/Party: D-CAS-3-10-CV-000720-001  
Amount: \$350.00

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CHECK  
Check/Money Order Num: 4420  
Amt Tendered: \$350.00

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Total Due: \$350.00  
Total Tendered: \$350.00  
Change Amt: \$0.00

There will be a fee of \$45.00  
charged for any returned check.